

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE:

KIND LLC “HEALTHY AND ALL NATURAL”
LITIGATION

This Document Relates to:

ALL ACTIONS

15-MD-2645 (WHP)

15-MC-2645 (WHP)

Hon. William H. Pauley III, presiding

**NOTICE OF PLAINTIFFS’
MOTION FOR CLASS
CERTIFICATION**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, supporting declarations, and any other submission that shall be made in support of this motion, Plaintiffs by and through their undersigned counsel, will move this Court, located at 500 Pearl Street, New York, NY 10007, Courtroom 20B, as soon as counsel may be heard, for an Order:

1. Certifying classes of customers of defendant KIND LLC that purchased at-issue products in New York, California, and Florida, as described more fully in the accompanying Memorandum of Law;
2. Appointing Plaintiffs as class representatives;
3. Appointing Plaintiffs’ counsel as class counsel;
4. Authorizing Plaintiffs to file a proposed plan for providing notice to the Classes; and
5. Providing such relief that the Court deems just and proper.

Respectfully submitted,

Dated: January 17, 2020

**FINKELSTEIN, BLANKINSHIP,
FREI-PEARSON & GARBER, LLP**

By: /s/ Todd Garber
Todd S. Garber
tgarber@fbfglaw.com
D. Greg Blankinship
gblankinship@fbfglaw.com
445 Hamilton Ave., Suite 605
White Plains, New York 10601
Tel: (914) 298-3283
Fax: (914) 824-1561

Tina Wolfson
twolfson@ahdootwolfson.com
Robert Ahdoot
rahdoot@ahdootwolfson.com
Theodore W. Maya
tmaya@ahdootwolfson.com
AHDOOT & WOLFSON, PC
10728 Lindbrook Drive
Los Angeles, California 90024-3102
Tel: (310) 474-9111
Fax: (310) 474-8585

Daniel L. Warshaw
dwarshaw@pswlaw.com
Matthew A. Pearson
mapearson@pswlaw.com
PEARSON, SIMON & WARSHAW, LLP
15165 Ventura Boulevard, Suite 400
Sherman Oaks, California 91403
Tel: (818) 788-8300
Fax: (818) 788-8104

*Co-Lead Counsel for Plaintiffs
and the Putative Class*